

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: YOLANDA STEWART

Case No. 19-11188

**CREDITOR'S, BANK OF HOLLY SPRINGS', MOTION
FOR ABANDONMENT AND RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY**

COMES NOW, the Creditor, Bank of Holly Springs, by and through its attorney of record, and files this its Motion for Abandonment and Relief from Automatic Stay and Co-Debtor Stay, and in support thereof, would respectfully show unto this Honorable Court, as follows:

(1)

On March 20, 2019, Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code.

(2)

Creditor would show that the creditor holds an interest in the following property which secures this debt namely, a 2001 Mercedes 500 VIN#WDBNG75JX1A146248, all farm equipment including a 2003 Mahindra tractor, 2008 King Cutter 5' tiller and a 2008 6 ½' disc/barrow w/attachments.

(3)

That the Debtor and co-maker, Walter Crutcher, have not been making the payments on the subject debt.

(4)

That the trustee and the debtor should abandon any interest that they may have in the collateral and the stay should be lifted as to the debtor and co-debtor, Walter Crutcher.

WHEREFORE, Premises Considered, Creditor, Bank of Holly Springs, prays that the Bankruptcy Court will abandon and surrender the above described collateral to Bank of Holly Springs and grant Bank of Holly Springs relief from the automatic stay as to the debtor and co-debtor, Walter Crutcher, to collect the debt or repossess the collateral held by the Creditor herein.

RESPECTFULLY SUBMITTED, this the 3rd day of March, 2020.

Bank of Holly Springs, Creditor
AKINS & ADAMS, P. A.

By: /s/ Bart M. Adams
Bart M. Adams
Attorney for Bank of Holly Springs

AKINS & ADAMS, P. A.
108 E. JEFFERSON STREET
RIPLEY, MISSISSIPPI 38663
(662) 837-9976

CERTIFICATE OF SERVICE

I, Bart M. Adams, attorney of record for the Creditor, do hereby certify that the following parties, being registered with the CM/ECF system, have this day received electronic notification to:

Locke D. Barkley sbeasley@barkley13.com

U. S Trustee USTPRegion05.AB.ECF@usdoj.gov

Karen B. Schneller, Esq. karen.schneller@gmail.com

Walter Crutcher
1617 Taska Road
Red Banks, MS 38661-9724

SO, CERTIFIED, this, the 3rd day of March, 2020.

/s/ Bart M. Adams
Bart M. Adams
Attorney for Creditor